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8 Attorneys for Plaintiff

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 UNITED STATES OF AMERICA, }
15 Plaintiff, }
16 v. }
17 MEDCHEM CORPORATION, and }
18 HASAN IBRAHIM, }
19 Defendants. }

20
21 No. CR 11-0811 EMC
22 STIPULATED PROTECTIVE ORDER

23
24 WHEREAS during the course of discovery in the above-captioned criminal case,
the United States may produce documents and other items that have been declassified;
and

25 WHEREAS the United States and defendants MEDCHEM CORPORATION and
HASAN IBRAHIM deem it appropriate to provide for the protection of such information;

26 IT IS HEREBY STIPULATED AND AGREED by and between the United States
27 and defendants MEDCHEM CORPORATION and HASAN IBRAHIM and their
28 respective counsel (collectively, the Defense) that all declassified information shall be

governed by the following provisions:

1 A. The Defense shall not disclose any declassified information to any person
2 other than the defendant, witnesses which they may be interviewing or preparing for trial,
3 and attorneys, law clerks, secretaries, translators, technical and other experts, and
4 investigators, involved in the representation of the defendants in this case;

5 B. The declassified information is now and will forever remain the property of the
6 United States Government. At the conclusion of this case the defense counsel, defense
7 counsel employees, defense translators, and anyone else who obtains declassified information
8 through discovery from the Government will return the declassified information and all
9 copies thereof to the Government;

10 C. The Defense will store the declassified information in a secure place and will
11 use reasonable care to ensure that the declassified information is not disclosed to third
12 persons, including the media, in violation of this agreement;

13 D. If the Defense makes any further copies of any of the declassified information,
14 the Defense will inscribe on each copy the following notation: "U.S. Government Property;
15 May Not Be Used Without U.S. Government Permission";

16 E. If the Defense releases custody of any of the declassified information, or
17 copies, summaries or transcripts thereof, to any person described in subparagraph (A), the
18 Defense shall provide such recipients with copies of this Order, and advise them that such
19 information is the property of the United States Government and that any unauthorized use
20 may constitute a violation of law or contempt of court;

21 F. Nothing herein constitutes a waiver of any right of any defendant, nor does
22 anything herein restrict in any way the right of the Defense to use the declassified
23 information in connection with any pleading or proceeding in this case;

24 G. All persons who receive declassified information produced in discovery in this
25 case by the United States Government shall execute the Acknowledgment of Stipulated
26 Protective Order appended to this Order, which shall be retained by defense counsel and
27 made available for inspection by the Court, upon request. Defendants shall not be required
28 to provide said Acknowledgment, or the identity of the person who signed it, to the United

1 States, unless so ordered by the Court. The United States retains the right to request that the
2 Court authorize such disclosure. The execution of the Acknowledgment of Stipulated
3 Protective Order is a condition precedent for such persons to have access to declassified
information in this case.

4 Nothing in this order shall preclude the United States or defendants MEDCHEM
5 CORPORATION and HASAN IBRAHIM from applying to the Court for further relief or
6 modification.

7 Willful violation of this Stipulated Interim Protective Order may be punishable by
8 contempt of court, whatever other sanction the Court deems just, or any other sanctions or
9 combination of sanctions which are legally available.

10

11 I hereby acknowledge that I have
12 reviewed and understand this Stipulated
13 Protective Order, and agree to be
bound by its terms:

14 DATED:

15 12/19/11

MELINDA HAAG
United States Attorney

PETER B. AXELROD
Assistant United States Attorney

19 DATED:

20 12/14/11

21 JAMES McNAIR THOMPSON
22 Counsel for HASAN IBRAHIM and
MEDCHEM CORPORATION

24 DATED:

25 12/13/2011

26 HASAN IBRAHIM
27 Individually and on behalf of MEDCHEM
28 CORPORATION

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2 IT IS SO ORDERED.
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DATED: 12/21/11



**ACKNOWLEDGMENT OF STIPULATED PROTECTIVE ORDER IN:
UNITED STATES v. MEDCHEM CORPORATION AND HASAN IBRAHIM,
CR 11-0811 EMC**

The undersigned hereby acknowledges that he or she has received a copy of the Stipulated Interim Protective Order issued in United States v. MEDCHEM CORPORATION AND HASAN IBRAHIM, CR 11-0811 EMC, has read, understands, and agrees to the terms of the Stipulated Protective Order, and hereby submits to the jurisdiction of the United States District Court for the Northern District of California for the purposes of enforcement of the terms of the Stipulated Protective Order and the punishment of any violations thereof.

DATED:

Signature

Printed Name

Street Address

City, State, and Zip Code

Area Code and Telephone Number